

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE THE APPLICATION OF:

████████████████████

CASE NO. _____

REQUEST FOR DISCOVERY PURSUANT
TO 28 U.S.C. § 1782

**DECLARATION OF JAKE NACHMANI
IN SUPPORT OF ██████████ *EX PARTE* APPLICATION
FOR AN ORDER PURSUANT TO 28 U.S.C. § 1782**

I, JAKE NACHMANI, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a member of the bars of the State of New York and this Court and a Partner at Seiden Law LLP (“Seiden Law”), attorneys for ██████████ (“Applicant” or “████████”), in the above-captioned matter, by which ██████████ seeks to conduct discovery and obtain evidence from ██████████ (“Respondent” or “████████”) for use in: (i) an ongoing litigation before the High Court of Justice in the Business and Property Courts of England and Wales, King’s Bench Division Commercial Court in London in the matter ██████████ (“UK Action”); (ii) a current litigation in Italy against the Italian Ministry of Economy and Finance pending before the Administrative Regional Tribunal of Lazio, Italy (“Italian Sanctions Action”); and (iii) an anticipated litigation in the competent court of Italy to be determined by Respondent’s place of residence (“Italian Action”) (and as to ██████████’s application, the “Application”).

2. I respectfully submit this declaration to place before the Court documents referenced in ██████████’s accompanying Memorandum of Law in support ██████████’s Application.

3. I do not waive and do not intend to waive any legal advice, litigation, or other privilege by referring to any matters in this declaration. I am over the age of eighteen, and, if called upon to do so, I could and would testify to the information contained herein.

4. [REDACTED] anticipates that [REDACTED] will soon be in New York. Upon [REDACTED] arrival in New York, [REDACTED] will serve [REDACTED] with this Application and all of its supporting papers.

5. Attached hereto as **Exhibit 1** is a true and correct copy of [REDACTED]'s proposed subpoena for documents from [REDACTED] ("Proposed Documents Subpoena"). Upon the Court's granting [REDACTED]'s Application and subject to the Court's approval, [REDACTED] will serve the Proposed Documents Subpoena on [REDACTED].

6. Attached hereto as **Exhibit 2** is a true and correct copy of [REDACTED]'s proposed subpoena for deposition testimony on [REDACTED] ("Proposed Deposition Subpoena"). Upon the Court's granting [REDACTED]'s Application and subject to the Court's approval, [REDACTED] will serve the Proposed Deposition Subpoena on [REDACTED].

Dated: June 25, 2025
New York, New York

/s/ Jake Nachmani
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Attorneys for [REDACTED]